IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA

IN RE: AQUEOUS FILM-FORMING FOAMS PRODUCTS LIABILITY LITIGATION)	Master Docket No.: 2:18-mn-2873-RMG
CITY OF CAMDEN, et al., Plaintiffs,)	Civil Action No.: 2:23-cv-03230-RMG
-VS-)	
E.I. DUPONT DE NEMOURS AND COMPANY (n/k/a EIDP, Inc.), et al.,)	
Defendants.)	

PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT, FOR CERTIFICATION OF SETTLEMENT CLASS AND FOR PERMISSION TO DISSEMINATE CLASS NOTICE

Plaintiffs, City of Camden, City of Brockton, City of Sioux Falls, California Water Service Company, City of Del Ray Beach, Coraopolis Water & Sewer Authority, Township of Verona, Dutchess County Water & Wastewater Authority and Dalton Farms Water System, City of South Shore, City of Freeport, Martinsburg Municipal Authority, Seaman Cottages, Village of Bridgeport, City of Benwood, Niagara County, City of Pineville, and City of Iuka, pursuant to Federal Rule of Civil Procedure 23 (a), (b) and (e), respectfully submit this Motion for: (1) Preliminary Approval of the Settlement Agreement; (2) preliminary certification, for settlement purposes only, of the Settlement Class; (3) approval of the form of Notice to the Settlement Class; (4) approval of the Notice Plan; (5) appointment of Class Counsel; (6) appointment of Class Representatives; (7) appointment of the Notice Administrator; (8) appointment of the

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Claims Administrator; (9) appointment of the Special Master; (10) appointment of the Escrow

Agent; (11) approval of the Escrow Agreement; (12) establishment of the Qualified Settlement

Fund; (13) scheduling of a Final Fairness Hearing; and (14) a stay of all proceedings brought by

Releasing Persons in the MDL and in other Litigation in any forum as to Settling Defendants, and

an injunction against the filing of any new such proceedings.

For the reasons set forth in the accompanying memorandum of law, the proposed

Settlement is fair, reasonable, and adequate, and the proposed class should be preliminarily

certified so that class notice may properly be disseminated.

Dated: July 10, 2023

Respectfully submitted,

/s/ Michael A. London

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Proposed Class Counsel

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically filed with this Court's CM/ECF on this 10th day of July, 2023 and was thus served electronically upon counsel of record.

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